

REMARKS

Favorable reconsideration of this application, as presently amended and in light of the following discussion, is respectfully requested.

Claims 1-21 are currently pending. Claims 1, 7, 8, 15, and 16 have been amended by the present amendment. The changes to the claims are supported by the originally filed specification and do not add new matter.

In the outstanding Office Action, Claims 1, 4-6, 19, and 20 were rejected under 35 U.S.C. § 103(a) as being unpatentable over the Rhodes et al. reference (“Remembrance Agent: A Continuously Running Automated Information Retrieval System”) in view of U.S. Patent No. 6,567,800 to Barrera (hereinafter “the ‘800 patent”), further in view of Widyantoro et al. (hereinafter “the Widyantoro et al. reference”) and U.S. Patent Application Publication No. 2004/0024739 to Copperman et al. (hereinafter “the ‘739 application”); Claims 2-3, 17, and 18 were rejected under 35 U.S.C. § 103(a) as being unpatentable over the Rhodes et al. reference and the Widyantoro et al. reference, further in view of the ‘800 patent, the ‘739 application, and U.S. Patent No. 6,094,681 to Schaffer et al. (hereinafter “the ‘681 patent”); Claims 7 and 8 were rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 5,974,412 to Hazlehurst (hereinafter “the ‘412 patent”) in view of the ‘681 patent and the ‘739 application; Claims 9 and 12-16 were rejected under 35 U.S.C. § 103(a) as being unpatentable over the ‘681 patent in view of the Lachman reference (“Animist Interface; Experiments And Mapping Character Animation To Computer Interface”) and the Widyantoro et al. reference, further in view of the ‘739 application; and Claims 10 and 11 were rejected under 35 U.S.C. § 103(a) as being unpatentable over the ‘681 patent, the Lachman reference, the Widyantoro et al. reference, and the ‘739 application, further in view of the Horvitz et al. reference (“The Lumiere Project: Bayesian User Modeling for Inferring the Goals and Needs of Software Users”).

Applicants wish to thank the Examiner for the interview granted Applicants' representative on August 4, 2011, at which time the outstanding rejection of the claims was discussed. At the conclusion of the interview, the Examiner indicated that the proposed amendment to Claim 1 appeared to overcome the outstanding rejection of that claim. However, no agreement was reached regarding the proposed amendment to Claim 7, pending the Examiner's further consideration of the claims upon formal submission of a response to the outstanding Office Action.

Applicants respectfully submit that the objection to Claim 8 is rendered moot by the present amendment to that claim. Claim 8 has been amended to recite a non-transitory computer readable medium, as suggested in the outstanding Office Action.

Claim 1 is directed to an information processing apparatus, comprising: (1) an event occurrence detection device configured to detect an occurrence of an event; (2) an extraction device configured to extract attribute information and a keyword from a first document corresponding to the event, the attribute information and the keyword being extracted from different portions of the first document; (3) a search device configured to search a database using the extracted attribute information and the extracted keyword to retrieve a second document having matching attribute information having similarity to the attribute information extracted from the first document and the second document containing the extracted keyword; and (4) a display control device configured to display associated information corresponding to the second document, wherein the extraction device is configured to extract a plurality of keywords from the first document; and the search device is configured to extract the keyword from the plurality of keywords when **both** a corresponding keyword weight of the keyword was less than a first predetermined threshold at any time during a first predetermined time period prior to a time of the extraction, and the corresponding keyword weight was also greater than a second predetermined threshold at any time during a second

predetermined time period, longer than the first predetermined time period, prior to the time of the extraction.

Regarding the rejection of Claim 1 under 35 U.S.C. §103(a), the Office Action asserts that the Rhodes reference and the '800 patent disclose everything in Claim 1 with the exception that "... the search device is configured to extract the keyword from the plurality of keywords when both a corresponding keyword weight of the keyword was less than a predetermined threshold during a first predetermined time period prior to a time of the extraction, and the corresponding keyword weight was also greater than a predetermined threshold during a second predetermined time period prior to extraction,"¹ and relies on the Widyantoro et al. reference and the '739 application to remedy that deficiency.

The Rhodes et al. reference is directed to a program called the "Remembrance Agent" (RA) that augments human memory by displaying a list of documents that might be relevant to the user's current context. In particular, the Rhodes et al. reference discloses that the RA runs continuously in the background without user intervention, and every few seconds collects text within certain ranges around the current cursor position and sends the text to an information retrieval program. Further, the Rhodes et al. reference discloses that the information retrieval program produces suggestions of similar documents from the pool of documents that are pre-indexed on a nightly basis and that a line of text is presented to the user indicating various information about a document that could be relevant to the user's current context. In particular, the Rhodes et al. reference discloses that the suggestions presented to the user are kept to a single line each, and are always printed at the bottom of a text editor window. In particular, Applicants note that the Rhodes et al. reference discloses that the basis for selecting a document that might be similar to the user's current context is

¹ See page 5 of the outstanding Office Action.

“...document similarity based on the frequency of words common to the query and reference documents.”²

However, Applicants respectfully submit that the Rhodes et al. reference fails to disclose a search device configured to search a database using the extracted attribute information **and** the extracted keyword (the attribute information and the keyword being extracted from different portions of a first document) to retrieve a second document having matching attribute information having similarity to the attribute information extracted from the first document **and** the second document containing the extract keyword. In particular, Applicants respectfully submit that the Rhodes et al. reference is silent regarding a search device that finds attribute information having similarity to attribute information extracted from the first document, as well as the second document that contains the extracted keyword, which was extracted from the first document. Rather, the Rhodes et al. reference merely discloses that the basis of a similar document is the frequency of words that are common to two documents. On the contrary, Claim 1 requires matching both attribute information of a first document and a second document, and matching a keyword that is in the first document and also in the second document.

Further, the Office Action admits that the Rhodes reference fails to disclose that the search device is configured to extract the keyword from the plurality of keywords when **both** a corresponding keyword weight of the keyword was less than a first predetermined threshold at any time during a first predetermined time period prior to a time of the extraction, and the corresponding keyword weight was also greater than a second predetermined threshold at any time during a second predetermined time period, longer than the first predetermined time period, prior to the time of the extraction, as recited in amended Claim 1. Applicants respectfully submit that the Rhodes reference is completely silent regarding this limitation.

² See Rhodes et al. reference, page 122, right column. Emphasis added.

The '800 patent is directed to a system and method for searching web sites that uses category information to narrow the range of a website content search. In particular, the '800 patent discloses a method for searching for information stored on web sites including the steps of receiving a category selection, receiving a content search request for content in the selected category, and performing a content search on retrieved web site content that is correlated with the selected category.

However, the Office Action admits that the '800 patent fails to disclose a search device that is configured to extract the keyword from the plurality of keywords when both a corresponding keyword weight of the keyword was less than a first predetermined threshold at any time during a first predetermined time period prior to a time of extraction, and the corresponding keyword weight was also greater than a second predetermined threshold at any time during a second predetermined time period, longer than the first predetermined time period, prior to the time of the extraction, as recited in amended Claim 1.

The Widyantoro et al. reference is directed to a method to learn dynamic users' interests in an automated information filtering and gathering system that runs on the Internet. In particular, the Widyantoro et al. reference discloses a system that handles multiple domains of long-term and short-term user's interests simultaneously, using a 3-descriptor approach to represent the user's interest categories.

Further, as noted by the outstanding Office Action, the Widyantoro et al. reference discloses three types of weights: a positive weight, a negative weight, and a long-term interest weight. Further, as shown on page 408, the Widyantoro et al. reference discloses methods of updating the various weights.

However, Applicants respectfully submit that the Widyantoro et al. reference fails to disclose a device configured to extract the keyword from the plurality of keywords when both a corresponding keyword weight of the keyword was less than a first predetermined threshold

at any time during a first predetermined time period prior to a time of the extraction, and the corresponding keyword weight was also greater than a second predetermined threshold at any time during a second predetermined time period, longer than the first predetermined time period, prior to the time of the extraction, as recited in amended Claim 1.

In particular, Applicants respectfully submit that the Widyantoro et al. reference is completely silent regarding the first and second thresholds, the first predetermined time period, and the second predetermined time period recited in Claim 1. Further, Applicants note that the positive and negative weights and the long-term weights are each different weights representing different things. On the contrary, Claim 1 requires that the **same weight** be less than a first predetermined threshold during a first predetermined time period, and that the same weight also be greater than a second predetermined threshold during a second predetermined time period. Applicants respectfully submit that the Widyantoro et al. reference is completely silent regarding the two different time periods recited in Claim 1, and thus is completely silent regarding what a given weight needs to be during those two different time periods, as required by Claim 1. Rather, as discussed above, the Widyantoro et al. reference merely discloses three different types of weights that are updated in different ways, but does not indicate anything about what the weights need to be in various time periods, as required by Claim 1.

The '739 application is directed to a method and system to organize and retrieve information using taxonomies, a document classifier, and an autocontextualizer.

Further, as noted by the outstanding Office Action, '739 Figure 3 illustrates a flowchart depicting a process of creating a "smart summary." In particular, the '739 application discloses that taxonomy tags are ordered by weight and grouped by taxonomy, and that taxonomy weights are compared to a threshold in step 120. However, Applicants initially note that the '739 application discloses a single threshold in Figure 3.

Separately, Applicants note that the Office Action on page 7 cites to paragraph [0143] of the '739 application, which relates to the process shown in Figures 9A-9D, which are flowcharts depicting the process for generating a knowledge map. Applicants initially note that the process shown in Figure 3 and the process shown in Figures 9A-9D are completely unrelated. Further, the Office Action has apparently cited to paragraph [0143] because it states that "...the same or a different similarity threshold may be used" in step 9060, which describes finding clusters CI that are similar to a given cluster C.

Further, Applicants respectfully submit that the process shown in Figure 9C is completely unrelated to Claim 1. Claim 1 requires that a keyword weight be less than a first predetermined threshold at any time during a first predetermined time period and also to be greater than a second predetermined threshold at any time during a second predetermined time period, longer than the first predetermined time period. Applicants respectfully submit that the '739 application is completely silent regarding this limitation, and that the disclosure in paragraph [0143] of the same or different similarity thresholds being used relates to comparing clusters and how similar they are, has nothing to do with how a given keyword weight varies over time.

Moreover, Applicants note that the Office Action is attempting to combine the teachings of the Widyantoro et al. reference and the '739 application to somehow arrive at the search device recited in Claim 1. Applicants respectfully submit that, in addition to the fact that the limitations of the search device recited in Claim 1 are not found in the combined teachings of the Widyantoro et al. reference and '739 application, the noted teachings of the two references are unrelated and not combinable in the manner suggested by the outstanding Office Action. As discussed above, the '739 application discloses a threshold in Figure 3, and similarity thresholds in Figure 9C in a completely unrelated process, while the Widyantoro et al. reference discloses short-term and long-term weights and no thresholds and

no time periods. Further, the '739 application does not disclose the time periods recited in Claim 1.

Thus, no matter how the teachings of the Rhodes reference, the '800 patent, the '739 application, and the Widyantoro et al. reference are combined, the combination does not teach or suggest a search device configured to extract the keyword from the plurality of keywords when both a corresponding keyword weight of the keyword was less than a first predetermined threshold at any time during a first predetermined time period prior to a time of the extraction, and the corresponding keyword weight was also greater than a second predetermined threshold at any time during a second predetermined time period, longer than the first predetermined time period, prior to the time of the extraction, as recited in Claim 1.

Accordingly, Applicants respectfully submit that the rejection of Claim 1 (and all similarly rejected dependent claims) is render moot by the present amendment to Claim 1.

Regarding the rejection of dependent Claims 2, 3, 17, and 18 under 35 U.S.C. § 103(a), Applicants respectfully submit that the '681 patent fails to remedy the deficiencies of the Rhodes reference, the '800 patent, the '739 application, and the Widyantoro et al. reference, as discussed above. Accordingly, Applicants respectfully submit that the rejections of Claims 2, 3, 17, and 18 are rendered moot by the present amendment to Claim 1.

Amended Claim 7 is directed to an information processing method for an information processing apparatus for detecting a keyword from a text file corresponding to an event that has taken place and displaying associated information corresponding to said keyword, comprising: (1) extracting attribute information from a plurality of existing text files; (2) extracting existing keywords from among words contained in said plurality of existing text files; (3) computing weights for said existing keywords based on use of occurrence frequency in each text file and distribution over the plurality of existing text files, sorting the plurality of existing text files based only on time, sorting, for each existing keyword, the computed

weights in a time dependent manner, determining important keywords as those keywords of the extracted existing keywords having a computed weight higher than a predetermined threshold, and acquiring associated information for each important keyword in descending order of the computed weight of the important keyword, the associated information being obtained by accessing a search engine on the Internet using each important keyword as a search term; (4) constructing a database by associating each important word with at least one of said attribute information extracted in the extracting step and said associated information acquired in the acquiring step; (5) detecting an occurrence of said event; (6) detecting an event keyword from said text file corresponding to said event detected in the event occurrence detecting step; (7) searching said database constructed in the database constructing step to retrieve said associated information corresponding to said event keyword detected in the event keyword detecting step; and (8) controlling displaying of said associated information retrieved in the searching step. The changes to Claim 7 are supported by the originally filed specification and do not add new matter.³

Regarding the rejection of Claim 7 under 35 U.S.C. § 103(a), the Office Action asserts that the '412 patent and the '681 patent disclose everything in Claim 7 with the exception of "... considering the distribution over the plurality of existing text files and sorting in a time dependent manner and determining important keywords as those keywords of the extracted keywords having a computer weight higher than a predetermined threshold,"⁴ and relies on the '739 application to remedy those deficiencies.

The '412 patent is directed to a system for identifying information, including (1) multiple information sets each representing a portion of the information; and (2) multiple collators each independently deriving vector spaces from associated information sets and identifying concepts in the vector spaces, wherein the multiple collators independently

³ See, e.g., Figures 3 and 4 and the discussion related thereto in the specification on page 19.

⁴ See page 15 of the outstanding Office Action.

identify information in the associated information sets according to the identified concepts in the vector spaces and compete against each other to identify relevant information in response to information queries. In particular, as shown in Figure 4, the '412 patent discloses a system in which information sources are processed using "grinders," "tanks," "mites," and "collators," so as to generate a set of indices for the information and to extract keywords from the document so as to organize the information from the information sources. Thus, the '412 patent discloses an intelligent query engine that uses machine learning techniques to facilitate the automated emergence of information spaces in which objects are represented as vectors of real numbers. Further, the '412 patent discloses that the system delivers information to users based on similarity measures applied to the representation of the objects in the information spaces.

However, as admitted in the outstanding Office Action, the '412 patent fails to disclose detecting an occurrence of an event, detecting an event keyword, searching the database constructed in the database construction step, and controlling display of the associated information retrieved in the searching step, as recited in amended Claim 7.

Further, Applicants respectfully submit that the '412 patent fails to disclose competing weights for the existing keywords based on the use of occurrence frequency in each text file and distribution over the plurality of existing text files, sorting the plurality of existing text files based only on time, sorting, for each of the existing keywords, the computed weights in a time dependent manner, determining important keywords as those keywords of the extracted existing keywords having a computed weight higher than a predetermined threshold, and acquiring associated information for each important keyword in descending order of the computed weight of the important keyword, the associated information being obtained by accessing a search engine on the Internet using each important keyword as a search term, as recited in amended Claim 7.

While the '412 patent discloses a system that analyzes documents, extracts keywords from those documents, and organizes the associated information space, the '412 patent is silent regarding acquiring associated information by accessing a search engine on the Internet using each important keyword as a search term, wherein the important keyword is obtained from a text file, as recited in amended Claim 7. Rather, the '412 patent merely discloses "grinding" and extracting of information from a text file.

The '681 patent is directed to a method for automatically providing remote notification of an ongoing event that includes detecting the event by receiving presently occurring data and analyzing the content of the data by using a data filter. In particular, the '681 patent is directed to a method for providing automatic remote notification of a locally detected event including designating at least one event as being of interest to a first user of a data network, monitoring the specified user-intended messages received via the data network for conveying message information to the first user; analyzing a content of the specified messages to determine whether the content is indicative of occurrence of one of the designated events; determining whether the first user is available to receive an automated event notification if the occurrence of an event is detected; automatically establishing a telecommunications link to a specified remote user device in response to a determination that the first user is unavailable; and transmitting the automated event notification to the specified remote user communication device via the telecommunications link.

However, Applicants respectfully submit that the '681 patent fails to disclose sorting the plurality of existing text files based only on time, sorting, for each existing keyword, the computed weights in a time dependent manner, determining important keywords as those keywords of the extracted existing keywords having a computed weight higher than a predetermined threshold, and acquiring associated information for each important keyword in descending order of the computed weight of the important keyword, the associated

information being obtained by accessing a search engine on the Internet using each important keyword as a search term, as recited in amended Claim 7. Applicants respectfully submit that the '681 patent was not relied upon by the Examiner for disclosing the acquiring step recited in amended Claim 7.

The '739 application is directed to a method and system to organize and retrieve information using taxonomies, a document classifier, and an autocontextualizer.

However, Applicants respectfully submit that the '739 application fails to disclose at least sorting the plurality of existing text files based only on time, sorting, for each existing keyword, the computed weights in a time dependent manner, and acquiring associated information for each important keyword in descending order of the computed weight of the important keyword, as recited in amended Claim 7. While the '739 application discloses that a feature recognizer can recognize features including dates and times, and that metadata constraints include at least one of date ranges regarding the last modified date of a knowledge container, the creation date of a knowledge container, and the expiration date of a knowledge container, the '739 application is silent regarding sorting the plurality of existing text files based only on time and sorting, for each existing keyword, the computed weights in a time dependent manner, as required by Claim 7.

In this regard, Applicants note that page 28 of the Office Action states that paragraph [0053] in the '739 application discloses "ordering" weights, and that other paragraphs in the '739 application discloses "the use of time dependent ordering," which the Office Action appears to assert implies that the '739 application discloses sorting computed weights in a time dependent manner, as recited in amended Claim 7.

However, Applicants note that paragraph [0053] in the '739 application only discloses that taxonomy tags are ordered by weight, and not that the weights are ordered by time, and for each existing keyword. Moreover, Claim 21 on page 23 of the '739 application, which

was cited by the Office Action, only states that knowledge containers can be classified based on features in the knowledge container that can include date and time, while paragraph [0058] in the '739 application discloses that the content of a knowledge container can include dates and times, which are features of the knowledge container. However, even combining these separate teachings within the '739 application, the combination does not teach or suggest that existing text files are sorted based only on time, or that the computed weights, for each existing keyword, are sorted in a time dependent manner, as recited by Claim 7. In a non-limiting example, Applicants refer the Examiner to the example shown in Figure 4 of the originally filed specification, wherein, for each keyword, the weights are sorted from left to right in terms of time.

Moreover, Claim 7 has been amended to clarify that the plurality of existing text files are sorted based only on time, a feature which is not disclosed in any of the cited references.

Thus, no matter how the teachings of the '412 patent, the '681 patent, and the '739 application are combined, the combination does not teach or suggest at least sorting the plurality of existing text files based only on time, and sorting, for each existing keyword, the computed weights in a time dependent manner, as recited in amended Claim 7. Accordingly, Applicants respectfully submit that the rejection of Claim 7 is rendered moot by the present amendment to that claim. Independent Claim 8 recites limitations analogous to the limitations recited in Claim 7, and has been amended in a manner analogous to the amendment to Claim 7. Accordingly, for the reasons stated above for the patentability of Claim 7, Applicants respectfully submit that the rejection of Claim 8 is rendered moot by the present amendment to that claim.

Claim 9 is directed to an information processing apparatus for displaying an animated agent on a display device and for displaying associated information related to a text file processed by a predetermined application program, comprising: (1) a processing detection

device configured to detect, as an event, predetermined processing of said predetermined application program; (2) a keyword detection device configured to detect a plurality of keywords from said text file processed by said predetermined application program corresponding to said event detected by said processing detection device; (3) means for computing weights for said keywords based on use of occurrence frequency in the text file, selecting an important keyword from the plurality of keywords when both a corresponding keyword weight of the keyword was less than a first predetermined threshold at any time during a first predetermined time period prior to a time of the selection, and the corresponding keyword weight was also greater than a second predetermined threshold at any time during a second predetermined time period, longer than the first predetermined time period, prior to the time of the selection, and searching for said associated information for the important keyword by searching a database for a previously processed existing file corresponding to the important keyword; (4) an input device configured to input a command; (5) a command processing device configured to execute, in response to said command inputted by said input device, processing on said associated information; and (6) a display control device configured to display, in response to said event detected by said processing detection device, said animated agent onto said display device and changing a manner of displaying said animated agent in response to said command inputted by said input device.

Regarding the rejection of Claim 9 under 35 U.S.C. § 103(a), the Office Action asserts that the '681 patent and the Lachman reference disclose everything in Claim 9 with the exception of means for computing weights for the keywords based on use of occurrence frequency in the text file, and searching for the associated information for each important keyword and the keyword having a weight higher than a predetermined threshold, and relies on the Widyanoro et al. reference and the '739 application to remedy those deficiencies.

As discussed above, the '681 patent is directed to a method for automatically providing remote notification of an ongoing event that includes detecting the event by receiving presently occurring data and analyzing the content of the data by using the data filter.

However, as admitted in the outstanding Office Action, the '681 patent fails to disclose the animated agent recited in Claim 9.

Further, Applicants respectfully submit that the '681 patent fails to disclose means for selecting an important keyword from the plurality of keywords when both a corresponding keyword weight of the keyword was less than a first predetermined threshold at any time during a first predetermined time period, longer than the first predetermined time period, prior to a time of the extraction, and the corresponding keyword weight was also greater than a second predetermined threshold at any time during a second predetermined time period, longer than the first predetermined time period, prior to the time of the extraction, as recited in amended Claim 9.

The Lachman reference is directed to the use of character animation in computer user interfaces and discloses various animated agents used to assist a user in navigating a software program.

However, Applicants respectfully submit that the Lachman reference fails to disclose means for selecting an important keyword from the plurality of keywords when both a corresponding keyword weight of the keyword was less than a first predetermined threshold at any time during a first predetermined time period prior to a time of the extraction, and the corresponding keyword weight was also greater than a second predetermined threshold at any time during a second predetermined time period, longer than the first predetermined time period, prior to the time of extraction, as recited in Claim 9.

As discussed above, the Widyantoro et al. reference is directed to a method to learn dynamic users' interests in an automated information filtering and gathering system running on the Internet.

However, as discussed above, the Widyantoro et al. reference fails to disclose means for selecting a keyword from the plurality of keywords when both a corresponding keyword weight of the keyword was less than a first predetermined threshold at any time during a first predetermined time period prior to a time of the extraction, and the corresponding keyword weight was also greater than a second predetermined threshold at any time during a second predetermined time period, longer than the first predetermined time period, prior to the time of extraction, as recited in Claim 9.

As discussed above, the Widyantoro et al. reference fails to disclose the two different time periods recited in Claim 9 and does not disclose that a single weight must satisfy the two different thresholds and the two different time periods, as recited in Claim 9. Rather, the Widyantoro et al. reference merely discloses three different types of weights and means for updating those weights.

The '739 application is directed to a method and system to organize and retrieve information using taxonomies, a document classifier, and an autocontextualizer.

As discussed above, Applicants respectfully submit that the '739 application fails to remedy the deficiencies of the Widyantoro et al. reference with respect to means for selecting an important keyword from the plurality of keywords when both a corresponding keyword weight of the keyword was less than a first predetermined threshold at any time during a first predetermined time period prior to a time of the extraction, and the corresponding keyword weight was also greater than a second predetermined threshold at any time during a second predetermined time period, longer than the first predetermined time period, prior to the time of execution, as recited in Claim 9. Rather, as discussed above, Figure 3 of the '739

application discloses a single threshold, while, in a completely unrelated context for clustering comparison, in Figure 9C, the '739 application discloses a possible use of different thresholds. However, as discussed above, the '739 application fails to disclose a single weight satisfying two different thresholds in two different time periods, as required by amended Claim 9.

Thus, no matter how the teachings of the '681 patent, the Lachman reference, the '739 application, and the Widyantoro et al. reference are combined, the combination does not teach or suggest means for selecting a keyword from the plurality of keywords when both a corresponding keyword weight of the keyword was less than a first predetermined threshold at any time during a first predetermined time period prior to a time of the extraction, and the corresponding keyword weight was also greater than a second predetermined threshold at any time during a second predetermined time period, longer than the first predetermined time period, prior to the time of the extraction, as recited in Claim 9. Accordingly, Applicants respectfully submit that the rejection of Claim 9 (and dependent Claims 12-14) are rendered moot by the present amendment to those claims.

Independent Claims 15 and 16 recite limitations analogous to the limitations recited in Claim 9. Accordingly, for the reasons stated above regarding Claim 9, Applicants respectfully submit that the rejections of Claims 15 and 16 are rendered moot by the present amendment to those claims.

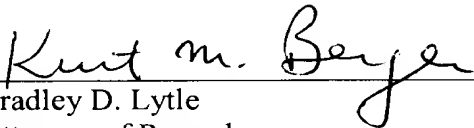
Regarding the rejection of dependent Claims 10 and 11 under 35 U.S.C. § 103(a), Applicants respectfully submit that the Horvitz reference fails to remedy the deficiencies of the Lachman reference, "the '681 patent, the '739 application, and the Widyantoro et al. reference, as discussed above. Accordingly, Applicants respectfully submit that the rejections of Claims 10 and 11 are rendered moot by the present amendment to Claim 9.

Thus, it is respectfully submitted that independent Claims 1, 7-9, 15, and 16 (and all associated dependent claims) patentably define over any proper combination of the cited references.

Consequently, in view of the present amendment and in light of the above discussion, the outstanding grounds for rejection are believed to have been overcome. The application as amended herewith is believed to be in condition for formal allowance. An early and favorable action to that effect is respectfully requested.

Respectfully submitted,

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